

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

§

v.

§

No. 4:19CR 243

Judge Mazzant / Johnson

QUAN TU (1)

a/k/a Aaron Tu Chan

§

LI XIN (2)

a/k/a Xin Li

§

§

§

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:



Count One

Violation: 18 U.S.C. § 371

(Conspiracy to Use Interstate Facility to Promote, Manage, Establish, Carry On, and Facilitate an Unlawful Activity, in violation of 18 U.S.C. § 1952(a)(3))

Introduction

At all times material to this Indictment:

1. Defendant **Quan Tu a/k/a Aaron Tu Chan** maintained a residence in Plano, Collin County, Texas, within the Eastern District of Texas, with his girlfriend and business partner **Li Xin a/k/a Xin Li**.
  
2. In or about October 2018, **Xin** signed a one-year lease to rent a residential property located at 2327 Trellis Place, Richardson, Texas (hereafter “Trellis Residence”). **Xin** agreed to pay a monthly rent of \$1,300 and represented that there would only be two individuals living in the property: **Xin** and a female relative.

3. On or about December 3, 2018, **Xin** created an account with the City of Plano, Texas to obtain utilities at a residence located at 1324 Maywood Court, Plano, Collin County, Texas, within the Eastern District of Texas (hereafter “Maywood Residence”).

4. On or about December 27, 2018, **Xin** applied for a certificate of occupancy for a commercial property located at 4002 Broadway Boulevard, Suite 101, Garland, Texas. **Xin**’s application listed the business as the “ABC Foot Spa” (hereafter “the Foot Spa”). At the time of her application, **Xin** signed a form required by the City of Garland, Texas, in which she represented that she would not be operating a sexually-oriented business, defined as “a … sexual encounter center, or any similar enterprise … the primary business of which is the offering of goods or services intended to provide sexual stimulation or sexual gratification to the customer.”

5. Between in or about December 2018, and in or about August 2019, **Tu** and **Xin** primarily resided at the Maywood Residence; however, both traveled to and among all three locations, as well as other locations outside of the North Texas metroplex, and both occasionally spent the night at the Trellis Residence and the Foot Spa.

6. The Texas Workforce Commission is a governmental agency within the State of Texas that is responsible for employment-related activities and that collects information about the employment history of Texas residents.

7. Texas Workforce Commission has no records of employment for **Tu**, **Xin**, or any other member of the conspiracy.

8. The website [www.adultsearch.com](http://www.adultsearch.com) (“AdultSeach”) was an online directory through which users could locate escorts, massage parlors, strip clubs, and sex shops within user-selected geographic areas. A poster’s advertisement included the city where he or she was located, contact information, a physical description of the provider, to whom the services were available, as well as whether the poster provided “incall” and “outcall” services. Advertisements on AdultSearch also enabled the poster to include photographs, emojis, emoticons, a header, and a descriptive paragraph entitled “A Little More....”

9. The website [www.escortindex.com](http://www.escortindex.com) (“EscortIndex”) was an online site that searched other websites used to advise escorts and prostitution-related activity and combined the advertisements onto one site.

10. The website [www.cityxguide.com](http://www.cityxguide.com) (“CityXGuide”) was an online site that offered free classified advertisements for female escorts, female models, and individuals offering adult and sexual services. Similar to AdultSearch, posters on CityXGuide could include contact information, photographs, and a description of available services.

11. Crown condoms were manufactured in Japan and Thailand, outside of the State of Texas. Astroglide personal lubricant was manufactured in Vista, California, outside of the State of Texas.

12. Texas Penal Code § 43.02 defines “Prostitution” as an offense wherein a person knowingly offers or agrees to receive a fee from another to engage in sexual conduct.

13. Texas Penal Code § 43.04 defines “Aggravated Promotion of Prostitution” as an offense wherein a person who knowingly owns, invests in, finances, controls, supervises, or manages a prostitution enterprise that uses two or more prostitutes.

The Conspiracy and its Objects

14. From in or about December 2018, and continuing through on or about August 13, 2019, in the Eastern District of Texas, and elsewhere, **Tu** and **Xin** knowingly and willfully conspired and agreed together, and with other persons known and unknown to the Grand Jury, to use facilities of interstate and foreign commerce, namely the Internet and cellular telephones, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of unlawful activity, that is a business enterprise involved in prostitution in violation of Texas Penal Code § 43.02 (Prostitution) and Texas Penal Code § 43.04 (Aggravated Promotion of Prostitution), and thereafter performed acts and attempted to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity, in violation of 18 U.S.C. § 1952(a)(3).

Manner and Means of the Conspiracy

15. It was the purpose of the conspiracy for defendants **Tu** and **Xin** to prostitute women for financial gain. As part of the conspiracy, **Tu** and **Xin** attempted to conceal their unlawful activity by conducting the enterprise in residential properties and at a massage business.

16. As part of the conspiracy, **Tu** and **Xin** communicated with women via an Internet-based texting application. Through these messages, **Tu** and **Xin** invited the women to travel to North Texas to work as masseuses.

17. The women traveled via plane or car before being ultimately taken to the Maywood Residence, the Trellis Residence, or the Foot Spa, where they would live while working for **Tu** and **Xin**.

18. Once employed by **Tu** and **Xin**, and living at one of the properties **Xin** leased, the women were required to see approximately 2 to 15 clients each day, depending on the woman and the location, with all of the proceeds going to **Tu** and **Xin**. Additionally, each woman was required to pay a space rental fee of \$20 per day. The women were only permitted to keep any tips they earned. In order to pay the daily rental fee or earn enough money for food or other necessities, **Xin** instructed the women to “do more.”

19. Members of the conspiracy posted advertisements for prostitution activities on Internet websites, including AdultSearch and CityXGuide. The advertisements would offer “Asian massage” or sexual services, include descriptions of the provider’s willingness to engage in sexual activities, request cash only payment, and would provide various phone numbers.

20. Each of the phone numbers listed were anonymous Internet phone numbers, that is, phone numbers **Tu** or **Xin** obtained from an Internet application that would link back to their actual phone numbers, but would conceal those real phone numbers from customers or law enforcement.

21. For incall appointments, **Tu** and **Xin** would correspond, via text message, with the prospective client to establish the time, location, service to be performed, and rate. **Tu** and **Xin** would often provide clients with an incorrect address until they arrived, at which time the client would receive a text message with the actual address of the Trellis Residence and the Maywood Residence.

22. Similarly, for outcall appointments, **Tu** or **Xin** would text message the client to establish the rate, sexual service to be performed, and time for the client's selected location. **Tu**, **Xin**, and conspirators transported the prostituted women, and caused the prostituted women to be transported, by vehicle to the location of the outcall appointments.

23. As part of the conspiracy, **Tu** would regularly drive between Houston, Texas and the Maywood Residence, Foot Spa, and Trellis Residence, to transport prostituted women. **Xin** regularly accompanied **Tu** on these trips.

24. Once residing at the Maywood Residence, the Foot Spa, and the Trellis Residence, the prostituted women did not leave. Instead, **Tu** traveled between the three locations, regularly purchasing and delivering groceries and other household items to the women.

25. Further, and as part of the conspiracy, **Tu** and **Xin** provided the prostituted women with items necessary to engage in prostitution activities, including Crown condoms, Astroglide personal lubricant, and personal cleaning items.

Overt Acts

26. In or about January 2019, members of law enforcement located a prostitution advertisement on the website www.escortfish.com that had been posted by **Tu, Xin**, and other conspirators. The advertisement was entitled “Come Kiss Me (emojis) Naughty Asian” with the phone number (720) 279-0115 and a list of sexual services.

27. On or about January 7, 2019, an undercover officer sent a text message to (720) 279-0115 and received the following response:

call when here get house number [Redacted] Trellis Pl, Richardson, TX  
75081, 300/bb/hr 200HR 180/45min 160HH

These terms referred to commercial sexual acts and prices. Specifically, the terms include price, length of the sexual service, and whether a condom would be used.

28. On February 4, 2019, **Tu** drove **Xin** to the Trellis Residence, where they picked up two women known to the Grand Jury (hereafter “Woman 1” and “Woman 2”). **Tu** drove **Xin**, Woman 1, and Woman 2 to the Comfort Inn and Suites located at 700 East Central Parkway, Plano, Texas. Woman 1 and Woman 2 checked into the hotel, paying in cash for two rooms.

29. On March 1, 2019, an undercover officer located an advertisement on EscortIndex entitled “Plano (emojis) Young&Sexy (emojis) Best Service (emojis) Asian Massage” with phone number (978) 566-3144. After sending a text message with a greeting, the undercover officer received the following response:

300 Legacy Dr,Plano,Tx 75023. 160/hhr ,200/hr.Cash only.No black Thx.  
New girl arrived at Feb 25.

These terms referred to commercial sexual acts and prices. Specifically, the terms include price and length of the sexual service.

30. When law enforcement arrived at the address, the undercover officer texted (978) 566-3144 and indicated that he could not find the location. **Xin** then came to the bottom of the stairs, where she could be seen typing on a cellular phone and looking around the parking lot. At the same time, the undercover officer received text messages from (978) 566-3144 with additional instructions.

31. On April 8, 2019, members of law enforcement conducted an undercover operation at a hotel located in Collin County, Texas. On or before that date, an undercover officer located an advertisement on CityXGuide entitled “BBBJ (emojis) GFE (emojis) New Asian (emojis) NUNU (emojis) Doggy (emojis) All U Want Is Here” with phone number (650) 398-5965. After sending a text message, the user at (650) 398-5965 sent pricing information and two addresses: the Comfort Inn and Suites located at 700 East Central Parkway, Plano, Texas, and the Trellis Residence.

32. Through additional text messages, the user at (650) 398-5965 agreed to have a driver bring a prostituted woman to the undercover officer at a hotel in Collin County, Texas for one-hour of sexual services at a rate of \$400. A woman known to the Grand Jury (hereafter “Woman 3”) arrived at the hotel room in Collin County, Texas and confirmed the rate of \$400. During a subsequent interview, Woman 3 provided contact information for a known associate of **Tu**’s who was then living in Plano, Texas.

33. On March 13, 2019, **Tu** and **Xin** arrived at the Foot Spa. **Tu** unlocked the front door and entered with **Xin**. **Tu** later traveled to a store where he purchased

groceries and other household items, paying in cash. **Tu** then returned to the Foot Spa and brought the purchased items inside.

34. On April 1, 2019, **Tu** applied a printed sign to the front glass of the Foot Spa, reading:

ABC FOOT SPA, Open 7 days a week, Sun-Thurs: 10am-10pm,  
Fri-Sat: 10am-11pm, 469-939-9000, Walk-ins Welcome

35. On May 9, 2019, members of law enforcement observed an adult male (hereafter “Man 1”) enter the Foot Spa. When Man 1 exited the premises approximately 50 minutes later, law enforcement approached him. Man 1 told the officers that he received massages at the Foot Spa and that on prior occasions he had received sexual services, including a “happy ending” or “hand job.”

36. On July 2, 2019, an undercover officer located an advertisement on CityXGuide for sexual services at the Foot Spa. The advertisement was entitled “BEST Spa in Garland (emojis) 469-939-9000 (emojis) Grand Opening (emojis) 100% Young Asian Girls (emoji) Nice.” The body of the advertisement read:

amazing body, clean & discreet, the new & sweet girls from Asia, hi gentlemen we are new here, pretty face & hot sexy body as u can see, we have curves that will make you say ‘WOW’!, so come meet me now, and we provide you with an unforgettable experience.

37. On July 6, 2019, **Tu** arrived at the Foot Spa driving a Toyota Tundra truck registered to Xin. **Tu** went inside the Foot Spa and returned carrying a suitcase, which he placed in the truck. A woman then exited the Foot Spa and entered the truck. **Tu** drove the woman to Houston, Texas.

38. On July 22, 2019, an undercover officer located an advertisement on AdultSearch entitled “Nude (emojis) B2B (emojis) BBJ (emojis) Suck & Lick (emojis) DATY (emojis) Magic Hand (emojis) 69 (emojis) Asian Fantasy (emojis) Call” with phone number (415) 513-0371. After initially receiving pricing for sexual services at the Trellis Residence, the user at (415) 513-0371 provided pricing for sexual services at the Maywood Residence.

39. Conducting surveillance at the Maywood Residence on that date, undercover officers observed an adult man (“Man 2”) enter the premises and remain inside for approximately 20 minutes. Man 2 agreed to speak with the officers and told them that he had texted with (415) 513-0371 to arrange for commercial sexual services. Man 2 was originally given the address for the Trellis Residence; however, upon arriving, Man 2 observed **Tu** walking between the Trellis Residence and a vehicle. Man 2 decided to leave.

40. Thereafter, Man 2 exchanged further text messages with (415) 513-0371 and scheduled an appointment for sexual services at the Maywood Residence. On that date, a prostituted woman performed oral sex on Man 2 for \$200 with a \$50 tip.

In violation of 18 U.S.C. § 371.

**Count Two**

Violation: 18 U.S.C. § 1594(c)  
(Conspiracy to Commit Sex Trafficking  
by Force, Fraud, and Coercion)

Between on or about January 1, 2019, and on or about August 13, 2019, in the Eastern District of Texas, and elsewhere, **Quan Tu a/k/a Aaron Tu Chan and Li Xin**

**a/k/a Xin Li**, defendants, did knowingly conspire with each other and with individuals known and unknown to the Grand Jury to recruit, entice, harbor, transport, provide, obtain, and maintain by any means individuals known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause those individuals to engage in a commercial sex act, and the defendants' acts were in and affecting interstate and foreign commerce, in violation of 18 U.S.C. § 1591(a)(1).

In violation of 18 U.S.C. § 1594(c).

**Count Three**

Violation: 18 U.S.C. §§ 1957 and 2  
(Engaging in Monetary Transactions in  
Property Derived from Specified  
Unlawful Activity; Aiding and Abetting)

On or about May 1, 2019, in the Eastern District of Texas, and elsewhere, **Li Xin a/k/a Xin Li**, defendant, aided and abetted by **Quan Tu a/k/a Aaron Tu Chan**, did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000; that is, the deposit of \$29,000 into a financial institution account, immediately followed by the withdrawal of that same amount in the form of a Cashier's Check made payable to "North Central Ford," such property having been derived from a specified unlawful activity, specifically, trafficking in persons as well as transporting, recruiting, and harboring a person for commercial sex acts.

In violation of 18 U.S.C. §§ 1957 and 2.

**NOTICE OF FORFEITURE**

Pursuant to 18 U.S.C. § 981(a)(1)(c), 18 U.S.C. § 982(a)(1), 28 U.S.C. § 2461, and 18 U.S.C. §§ 1594(d) & (e), upon conviction of the offense(s) alleged in this Indictment, the defendants, **Quan Tu a/k/a Aaron Tu Chan** and **Li Xin a/k/a Xin Li**, shall forfeit to the United States their interest in all property, real or personal, that constitutes or is derived from proceeds traceable to the aforementioned violations, including but not limited to the following property:

- a. 2017 black Toyota Tundra, bearing Texas license plate MCR-1861 and VIN number 5TFRM5F17HX116498;
- b. \$853 in US Currency (seized from 2327 Trellis Place);
- c. \$630 in US Currency (seized from 4002 Broadway Boulevard);
- d. \$1,140 in US Currency (seized from 1324 Maywood Court);
- e. A dark blue Asus brand smart phone with no case;
- f. A dark blue Asus brand smart phone in a clear phone case with visible damage to the front and back of the device;
- g. A blue Huawei Leica smartphone, bearing the printed text “SUMMILUX-H1:1.6/27 ASPH” on the back of the device; and
- h. A blue Huawei Leica smartphone, bearing the printed text “VARIO-SUMMILUX-H1:16-2.4/27-80 ASPH” on the back of the device.

If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been comingled with other property, which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above-forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

A TRUE BILL



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GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY



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MARISA J. MILLER  
Assistant United States Attorney

Date: 9/11/19

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## **NOTICE OF PENALTY**

### Count One

Violation: 18 U.S.C. § 371

Penalty: Imprisonment for not more than five years; a fine of not more than \$250,000, or not more than greater of twice the gross gain to the defendant; and a term of supervised release of not more than three years.

Special Assessment: \$ 100.00

## Count Two

Violation: 18 U.S.C. § 1594(c)

Penalty: Imprisonment for not less than 15 years and up to life; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$ 100.00

JVTA Assessment: \$ 5,000.00

## Count Three

Violation: 18 U.S.C. §§ 1957 and 2

Penalty: Imprisonment for not more than ten years; a fine of not more than \$250,000; and a term of supervised release of not more than three years.

Special Assessment: \$ 100.00